

1 MICHAEL A. JACOBS (CA SBN 111664)
2 MJacobs@mofo.com
3 ARTURO J. GONZÁLEZ (CA SBN 121490)
4 AGonzalez@mofo.com
5 ERIC A. TATE (CA SBN 178719)
6 ETate@mofo.com
7 RUDY Y. KIM (CA SBN 199426)
8 RKim@mofo.com
9 MORRISON & FOERSTER LLP
10 425 Market Street
11 San Francisco, California 94105-2482
12 Telephone: 415.268.7000
13 Facsimile: 415.268.7522

14 KAREN L. DUNN (*Pro Hac Vice*)
kdunn@bsflpp.com
15 HAMISH P.M. HUME (*Pro Hac Vice*)
hhume@bsflpp.com
16 BOIES SCHILLER FLEXNER LLP
17 1401 New York Avenue, N.W.
Washington DC 20005
18 Telephone: 202.237.2727
Facsimile: 202.237.6131

19 Attorneys for Defendants
20 UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

21 UNITED STATES DISTRICT COURT
22 NORTHERN DISTRICT OF CALIFORNIA
23 SAN FRANCISCO DIVISION

24 WAYMO LLC,

25 Plaintiff,

26 v.
27 UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,
28 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MAXWELL V.
PRITT IN SUPPORT OF
DEFENDANTS UBER
TECHNOLOGIES, INC.'S AND
OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL EXHIBITS TO THEIR
MOTION TO COMPEL PRODUCTION
OF DOCUMENTS**

Judge: Hon. Jacqueline Scott Corley
Trial Date: October 10, 2017

1 I, Maxwell V. Pritt, declare as follows:

2 1. I am an attorney at law at the law form of Boies Schiller & Flexner LLP. I make this
 3 declaration based upon matters within my own personal knowledge and if called as a witness, I
 4 could and would competently testify to the matters set forth herein. I make this declaration in
 5 support of Defendants' Administrative Motion to File Under Seal Exhibits to Their Motion to
 6 Compel.

7 2. I have reviewed the following exhibit and confirmed only the portions identified below
 8 merit sealing:

Document	Portions to Be Filed Under Seal	Designating Party
Ex. 1	Highlighted Portions	Plaintiff

12 3. Exhibit 1 is Plaintiff's Objections and Responses to Uber's and Ottomotto's First Set
 13 of Requests for Production (Nos. 1-146). I understand that the highlighted portions of Exhibit 1
 14 contain technical information that has been designated by Waymo as either confidential or highly
 15 confidential.

16 4. Defendants' request to seal is narrowly tailored to the specific exhibits that merit
 17 sealing.

18 I declare under penalty of perjury that the foregoing is true and correct. Executed this
 19 11th day of July, 2017 at Oakland, California.

21 Dated: July 11, 2017

BOIES SCHILLER FLEXNER LLP

23 By: /s/ Maxwell V. Pritt

24 Maxwell V. Pritt